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*Attorneys for Debtors and Reorganized Debtors*

**UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

**In re:**

**PG&E CORPORATION,**

**- and -**

**PACIFIC GAS AND ELECTRIC  
COMPANY,**

**Debtors.**

- ☐ Affects PG&E Corporation  
☐ Affects Pacific Gas and Electric Company  
☒ Affects both Debtors

*\* All papers shall be filed in the Lead Case, No. 19-30088 (DM).*

Bankruptcy Case No. 19-30088 (DM)

Chapter 11

(Lead Case) (Jointly Administered)

**DECLARATION OF ROBB MCWILLIAMS  
IN SUPPORT OF REORGANIZED  
DEBTORS' OBJECTION TO SECURITIES  
PLAINTIFFS' MOTION FOR THE  
APPLICATION OF BANKRUPTCY RULE  
7023 AND THE CERTIFICATION OF A  
CLASS OF SECURITIES CLAIMANTS**

Date: August 8, 2023

Time: 10:00 a.m. (Pacific Time)

Place: (Tele/Videoconference Only)

United States Bankruptcy Court  
Courtroom 17, 16th Floor  
San Francisco, CA 94102

1 I, Robb C. McWilliams, hereby declare that the following is true and correct to the best of my  
2 knowledge, information and belief:

3 1. I am a Partner and Managing Director at the firm of AlixPartners, LLP, which is an  
4 affiliate of both AlixPartners, LLC and AP Services, LLC (collectively, “**AlixPartners**”). AlixPartners  
5 provided interim management services to Pacific Gas and Electric Corporation and Pacific Gas and  
6 Electric Company, as debtors and reorganized debtors (collectively, the “**Debtors**,” and as reorganized  
7 pursuant to the Plan, the “**Reorganized Debtors**”) in the above-captioned chapter 11 cases (the  
8 “**Chapter 11 Cases**”). AlixPartners continues to assist the Reorganized Debtors in resolving the Chapter  
9 11 General Claims while also providing support with respect to the Securities Claims. I submit this  
10 Declaration in support of the *Reorganized Debtors’ Objection to the Securities Plaintiffs’ Motion and*  
11 *Memorandum of Points and Authorities in Support of Motion for the Application of Bankruptcy Rule*  
12 *7023 and the Certification of a Class of Securities Claimants* (the “**Objection**”).<sup>1</sup>

13 2. In my current position, I am responsible for overseeing the bankruptcy case management  
14 component of AlixPartners’ assignment to assist the Reorganized Debtors with various matters related  
15 to these Chapter 11 Cases. My areas of responsibility include the effort by AlixPartners, in coordination  
16 with the Reorganized Debtors, to review and assess the validity of all claims asserted against the Debtors,  
17 other than (a) Fire Claims and Subrogation Wildfire Claims and (b) providing support with respect to  
18 Securities Claims. I am generally familiar with the Reorganized Debtors’ day-to-day operations,  
19 financing arrangements, business affairs, and books and records. Except as otherwise indicated herein,  
20 all facts set forth in this Declaration are based upon my personal knowledge, the knowledge of other  
21 AlixPartners professionals working under and alongside me on this matter, my discussions with the  
22 Reorganized Debtors’ personnel and the Reorganized Debtors’ various other advisors, and my review of  
23 relevant documents and information prepared by the Reorganized Debtors. If called upon to testify, I  
24 would testify competently to the facts set forth in this Declaration. I am authorized to submit this

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25 <sup>1</sup> Capitalized terms used but not otherwise defined herein have the meanings ascribed to such terms in  
26 the Objection.

1 Declaration in support of the Motion.

2 3. As of Friday, July 21, 2023, the Reorganized Debtors have successfully resolved through  
3 objections, settlements, claim withdrawals, or otherwise resolved 5,299 Securities Claims—  
4 approximately 60% of the total Securities Claims. In total, the Reorganized Debtors have made  
5 settlement offers as to 5,618 Securities Claims, approximately 3,200 of these claims have been settled  
6 by settlement offers, and 862 have been declined. The remaining settlement offers remain outstanding.

7 4. Upon issuing a settlement offer, if the Securities Claimant provided the Reorganized  
8 Debtors with a mailing address or telephone number, the Reorganized Debtors typically reach out to  
9 Securities Claimants by mail and by phone multiple times to provide instructions to Securities Claimants  
10 on how to access their settlement offers on the web site and remind Securities Claimants to view their  
11 settlement offers and provide a response.

12 5. The Reorganized Debtors have begun to issue mediation notices pursuant to the Securities  
13 Procedures. Of the remaining unresolved Securities Claims, approximately 670 of those claims, and  
14 approximately 600 claimants are represented by Rolnick Kramer Sadighi LLP. These claims represent  
15 approximately 19% of the unresolved securities proofs of claim.

16 6. In total, the Reorganized Debtors have now resolved via settlement, claim objection,  
17 claim withdrawal and made settlement offers to approximately 87% of all Securities Claims and are on  
18 track to issue settlement offers to all remaining Securities Claims by August 15 who are not otherwise  
19 subject to an omnibus objection.

20 7. In the time after the June 7, 2023 hearing on the Motion to Extend, the Reorganized  
21 Debtors have settled an additional 411 Securities Claims.

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1 Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and  
2 correct to the best of my knowledge, information, and belief.

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4 Executed July 25, 2023 in Dallas, Texas.

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6 /s/ Robb McWilliams

7 Robb McWilliams  
8 Managing Director  
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